## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH DAKOTA CENTRAL DIVISION



UNITED STATES OF AMERICA,

CR 11-30034-01

Plaintiff,

<u>INDICTMENT</u>

v.

18 U.S.C. §§ 1153, 1201(a)(2); 2261(a)(2)

AARON YOUNG,

KIDNAPPING and INTERSTATE DOMESTIC VIOLENCE

Defendant.

The Grand Jury charges:

## COUNT I

On or between the 13th day of February, 2011, and the 14th day of February, 2011, in Todd County and Mellette County, in Indian country, in the District of South Dakota, the defendant, Aaron Young, an Indian, did willfully and unlawfully kidnap, abduct, seize, confine, inveigle, and carry away, Tina Neal, and transport Tina Neal, an Indian, and hold her for the purpose of assaulting her, in violation of 18 U.S.C. §§ 1153 and 1201(a)(2).

## COUNT II

On or between the 13th day of February, 2011, and the 14th day of February, 2011, in the District of South Dakota, the defendant, Aaron Young, did cause Tina Neal, his intimate partner, and dating partner, to enter and leave Indian country, that is, the Rosebud Sioux Tribe Reservation, by force, coercion,

duress, and fraud, and Aaron Young, in the course of, as a result of, and to facilitate such conduct and travel, did commit and attempt to commit crimes of assault and kidnapping against Tina Neal, in violation of 18 U.S.C. § 2261(a)(2).

A TRUE BILL:

Foreperson

BRENDAN V. JOHNSON United States Attorney

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